

MARTIN CLEARWATER & BELL LLP

COUNSELORS AT LAW

220 EAST 42ND STREET, NEW YORK, NY 10017-5842
TELEPHONE (212) 697-3122 FACSIMILE (212) 949-7054
www.mcblaw.com

AYANNA T. BLAKE
ASSOCIATE

DIRECT DIAL: (516) 222-8502
E-MAIL: ayanna.blake@mcblaw.com

NEW YORK, NY
EAST MEADOW, NY
WHITE PLAINS, NY
ROSELAND, NJ
ROCHESTER, NY
STAMFORD, CT

August 21, 2018

Via ECF Filing

Magistrate Judge Ramon E. Reyes, Jr.
United States District Court for the
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: **RAYMIS KIMBERLEY RUIZ and JOHN MESSING, JR. V. BAY SHORE-
BRIGHTWATERS RESCUE AMBULANCE, INC., ET AL.**
Civil Action No.: 18-cv-280 (RRM)(RER)

Dear Magistrate Judge Reyes:

We are counsel to Defendants Bay Shore–Brightwaters Rescue Ambulance, Inc., *et al.* (“Defendants”), in the above-referenced matter. With respect to Your Honor’s docketed Order dated August 15, 2018, the parties jointly write this letter to inform Your Honor that we have conferred and reached an agreement respecting the scheduling of the below depositions. The depositions have been scheduled as follows:

- Plaintiff Raymis Kimberly Ruiz: 9/4/18
- Plaintiff John Messing: 9/4/18
- Defendant Alex Mullin: 9/11/18
- April Kunz: 9/19/18
- Defendant Charles Chapman: 9/21/18
- Defendant Joseph Frisina: 9/25/18
- Defendant Felix Rodriguez: 9/27/18

Honorable Ramon Reyes
August 21, 2018
Page 2

With respect to the deposition of non-party witness Donna Fudge, we have not been able to confirm her availability as she appears uncooperative at this time. Plaintiffs' counsel indicated that they will attempt to serve Ms. Fudge with a subpoena in order to secure her appearance at a deposition.

Thank you.

Respectfully submitted,
MARTIN CLEARWATER & BELL LLP

By: /s/ Ayanna T. Blake

cc: Gregory Calliste, Jr., Esq. (via ECF)